

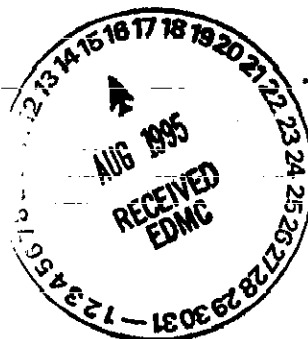
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Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

AUG 03 1995



Mr. Douglas R. Sherwood  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352-0539

Dear Mr. Sherwood:

## NOTICE TO SHIP WASTE FROM 183-H SOLAR EVAPORATION BASINS

In reference to the U.S. Department of Energy, Richland Operations Office (RL), letter to Mr. R. F. Smith, U.S. Environmental Protection Agency (EPA), from Ms. J. K. Erickson, RL, "Request for a Contained-In Determination for Hazardous Debris Contaminated with Listed Waste at 183-H Solar Evaporation Basins, Hanford Site," dated June 5, 1995, RL requested a contained-in determination decision from EPA, Region 10, by July 12, 1995, to provide sufficient time for verification sampling of the concrete at the subject unit. As of today's date, RL is not aware of a decision on this request from EPA. 41473

With the restrictions of the 90-day storage requirements, the concrete residue will start to be shipped as mixed waste, without the benefit of contingent management that the contained-in determination would have allowed. A potential cost savings to this cleanup project of approximately \$200,000.00 is being lost. This is an immediate cost and does not include the costs necessary for requesting and obtaining a treatability variance nor the costs for offsite shipment and disposal of the concrete (the Hanford Site has no disposal unit that can accept wastes designated for "U" and "P" listed constituents due to the ultimate generation of "U" and "P" listed multi-source leachate for which no onsite treatment or disposal is available).

A contained-in determination for concrete is an available regulatory tool for the EPA to utilize in order to assure both protection of human health and the environment and efficient expenditure of resources for cleanup of a unit. RL continues to maintain that disposal of the concrete residues in the 200 Area as nonlisted waste is a protective management option. Listed constituents are below Washington State cleanup levels and other constituents of concern, while present, do not exceed Washington State Model Toxics Control Act Method C soil standards (arsenic slightly exceeds Method C soil standards but does not exceed Method C industrial soil standards). EPA has not provided RL with technical justification as to why they agree or disagree with this conclusion.

RL is continuing to request a decision from EPA on this matter. A contained-in determination at a later date can still benefit cleanup of this unit as concrete continues to be generated during decontamination of the basin walls.

Mr. D. R. Sherwood

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If you have any questions, please call Mr. Jeff Bruggeman on 376-7121.

Sincerely,



J. K. Erickson, Director  
River Sites Restoration Division

RSD:JMB

cc: S. Alexander, Ecology  
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